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*Attorneys for Defendant
Norwich Pharmaceuticals, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

TAKEDA PHARMACEUTICAL COMPANY
LIMITED, and TAKEDA
PHARMACEUTICALS U.S.A., INC.,

Plaintiffs,

v.

NORWICH PHARMACEUTICALS, INC.,

Defendant.

C.A. No. 20-cv-8966-SRC-CLW

**DEFENDANT'S NOTICE OF
UNOPPOSED MOTION TO SEAL**

Motion Date: November 15, 2021

Document Filed Electronically

TO: All Counsel of Record

PLEASE TAKE NOTICE that on **Monday, November 15, 2021 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, Defendant Norwich Pharmaceuticals, Inc. ("Norwich") shall appear before the Honorable Cathy L. Waldor, U.S.M.J., at the Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Courtroom 4D, Newark, New Jersey 07102, and shall move this Court, pursuant to Local Civil Rule 5.3(c), for an Order permanently sealing portions of the following, which were filed under temporary seal:

1. The Declaration of Andrew S. Roper, Esq. in Support of Takeda's Opening Claim Construction Brief (ECF No. 79);
2. Takeda's Opening Claim Construction Brief (ECF No. 88);

3. The Declaration of Dr. Leonard J. Chyall, Ph.D. in Support of Takeda's Opening Claim Construction Brief (ECF No. 88-1); and
4. Exhibits 45, 47-55, and 58 to the Declaration of Andrew S. Roper, Esq. in Support of Takeda's Opening Claim Construction Brief (ECF Nos. 86-1 to 86-12).

PLEASE TAKE FURTHER NOTICE that in support of its Motion, Norwich shall rely upon the Declaration of Andrea Sweet and the accompanying Index. A proposed form of Order, including Proposed Findings of Fact and Conclusions of Law, is also submitted for the Court's consideration.

PLEASE TAKE FURTHER NOTICE that Plaintiffs Takeda Pharmaceutical Company Limited and Takeda Pharmaceuticals U.S.A., Inc. (collectively, "Takeda") do not oppose the relief requested by Norwich's Motion.

PLEASE TAKE FURTHER NOTICE that the proposed redacted versions of (1) the Declaration of Andrew S. Roper, Esq. in Support of Takeda's Opening Claim Construction Brief (ECF No. 79) has been filed under ECF No. 116; (2) Takeda's Opening Claim Construction Brief (ECF No. 88) has been filed under ECF No. 118; (3) the Declaration of Dr. Leonard J. Chyall, Ph.D. in Support of Takeda's Opening Claim Construction Brief (ECF No. 88-1) has been filed under ECF No. 118-1; (4) Exhibits 45 and 47-55 to the Declaration of Andrew S. Roper, Esq. in Support of Takeda's Opening Claim Construction Brief (ECF Nos. 86-1 to 86-11) have been filed under ECF No. 117; and Exhibit 58 to the Declaration of Andrew S. Roper, Esq. in Support of Takeda's Opening Claim Construction Brief (ECF No. 86-12) has been filed under ECF No. 117-1.

Dated: October 12, 2021

Respectfully submitted,

SAIBER LLC

s/ Arnold B. Calmann

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